

## REMARKS

### Rejections

#### *Rejections under 35 U.S.C. § 103*

#### Claims 1-6 and 8-28

Claims 1-6 and 8-28 stand rejected under 35 U.S.C. § 103(a) as being obvious over U.S. Patent 6,411,724 to Vaithilingam et al. in view of U.S. Patent 6,847,980 to Benitez et al. Both Vaithilingam and Benitez qualify as prior art only under 35 U.S.C. § 102(e) because they both issued after Applicant's effective filing date. Applicant does not admit that either reference is prior art and reserves the right to challenge one or both of the references at a later date.

Prior to discussing the prior art, Applicant presents the following definitions for terms of art as set forth in paragraphs 6-9 of Applicant's Specification. Audiovisual content, such as video or still images, can be abstracted to a set of "descriptors" that represent the features of the content, i.e., a house, a car, a dog, etc. A "description scheme" defines the relationships among the descriptors, i.e., a car is in front of a house and a dog is sitting in the car. The descriptors and descriptions are written in a "data description language" (DDL) and are grouped into various combinations, or DDL "schemas," that correspond to different types of content. An "instance document" is the description of a particular piece of content that specifies a DDL schema and values for the descriptors specified in the schema. For example, one instance document can describe a picture of a blue car in front of a white house with a brown dog sitting in the car, but a different instance document is needed to describe a picture of a brown car sitting in front of a green house with a spotted dog sitting in the car.

Turning now to the prior art, the Examiner asserts that Vaithilingam teaches the claim element "obtaining an instance document that encodes the descriptions of multimedia content for a general application domain." However, Vaithilingam discloses extracting descriptors from pieces of content (Figure 1, elements 10-34) and storing the descriptors in a database for subsequent searching. Neither the pieces of content nor the database in Vaithilingam are equivalent to an instance document as the term is used in the art and in Applicant's claim. In fact, Vaithilingam contains no disclosure directed toward

an instance document as claimed. Accordingly, Vaithilingam cannot be properly interpreted as obtaining an instance document as claimed.

The Examiner asserts that Benitez teaches the claim element "transforming the instance document from the general application domain to the specific application domain by mapping from a general application namespace to a specific application namespace." Benitez discloses creating generic description records from various content. However, Benitez does not disclose describing a particular piece of content using the generic description records. In fact, Benitez contains no disclosure directed toward an instance document as the term is used in the art and in Applicant's claim. Accordingly, Benitez cannot be properly interpreted as disclosing the transforming of an instance document in a general application domain to a specific application domain as claimed.

Applicant respectfully reminds the Examiner that he is required to interpret claim terms according to the definitions set forth in the specification. In addition to the definitions given above, Applicant's claim term "specific application domain" is defined in paragraphs 21 and 22 of Applicant's Specification. Neither Vaithilingam nor Benitez disclose a specific application domain as defined and claimed by Applicant.

Therefore, the combination cannot render obvious Applicant's invention as claimed in claims 1-6 and 8-28, and Applicant respectfully requests the withdrawal of the rejection of the claims under 35 U.S.C. § 103(a) over the combination.

#### **Claim 7**

Claim 7 stands rejected under 35 U.S.C. § 103(a) as being obvious over the combination of Vaithilingam and Benitez in light of U.S. Patent 6,593,936 to Huang et al. Huang qualifies as prior art only under 35 U.S.C. § 102(e) because it issued after Applicant's filing date. Applicant does not admit that Huang is prior art and reserves the right to challenge the reference at a later date.

Huang discloses generating description schemes using XML. However, Huang does not teach or suggest that an XML stylesheet document can be used to define a mapping between a general application namespace and a specific application namespace as claimed in claim 7.

Furthermore, claim 7 depends from claim 1. Huang contains no disclosure directed toward an instance document as claimed in claim 1. Because the combination of

Vaithilingam and Benitez also does not disclose an instance document as claimed, the combination of Vaithilingam, Benitez and Huang cannot be properly interpreted teaching or suggesting this claim element.

Therefore, the combination cannot render obvious Applicant's invention as claimed in claim 7, and Applicant respectfully requests the withdrawal of the rejection of the claims under 35 U.S.C. § 103(a) over the combination of Vaithilingam, Benitez and Huang.

### **SUMMARY**

Claims 1-28 are currently pending. In view of the foregoing remarks, Applicant respectfully submits that the pending claims are in condition for allowance. Applicant respectfully requests reconsideration of the application and allowance of the pending claims.

If the Examiner determines the prompt allowance of these claims could be facilitated by a telephone conference, the Examiner is invited to contact Sue Holloway at (408) 720-8300 x309.

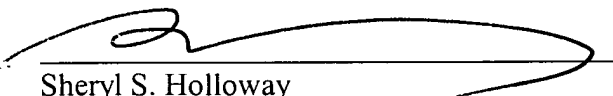
### **Deposit Account Authorization**

Authorization is hereby given to charge our Deposit Account No. 02-2666 for any charges that may be due. Furthermore, if an extension is required, then Applicant hereby requests such extension.

Respectfully submitted,

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Dated: FEB. 27, 2006



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